

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

APR -8 PM 3:09  
DEPUTY CLERK *all*

UNITED STATES OF AMERICA §  
§  
v. § No. 3:10-CR-073-K  
§  
ROBERTO MARIO ANGULO-ISAZA (04) §

**FACTUAL RESUME**

Roberto Mario Angulo-Isaza (“Angulo-Isaza”), defendant, John Hunter Smith and Thomas Wynne, the defendant’s attorneys, and the United States of America, agree that the following facts are true and correct and may be submitted to the Court in support of Angulo-Isaza’s guilty plea to Count One of the Indictment:

**ELEMENTS OF THE OFFENSE**

Violation of 21 U.S.C. §§ 952 and 963

- First: That a conspiracy existed between at least two non-government persons to import into the United States a controlled substance;
- Second: That Angulo-Isaza knew of the conspiracy;
- Third: That Angulo-Isaza intentionally participated in the conspiracy in that he joined it willfully, that is, with the intent to further its unlawful purpose; and,
- Fourth: That the amount of cocaine imported into the United States as part of the conspiracy was five kilograms or more.

STIPULATED FACTS

Beginning in or about October 2006, the exact date being unknown, and continuing to on or about January 1, 2008, in the Dallas Division of the Northern District of Texas, and elsewhere, Angulo-Isaza, knowingly and intentionally combined, conspired, confederated and agreed with Harold Mauricio Poveda-Ortega, Horley Rengifo-Pareja, Jenny Vivian Hurtado-Beltran, FNU LNU, a.k.a. "Condor", FNU LNU a.k.a. "El Mono", Tito Miller Parra-Isaza, Joaquin Alejandro Sendero Higuera, and others to import into the United States five kilograms or more of cocaine, a Schedule II controlled substance.

In furtherance of the conspiracy, Angulo-Isaza had meetings with Poveda-Ortega, Rengifo-Pareja, and others to discuss moving quantities of cocaine exceeding 150 kilograms from Ecuador to Dallas, TX. Angulo-Isaza and the others agreed that the cocaine's ultimate destination would be Spain. During meetings, Angulo-Isaza and other named co-conspirators discussed the logistics for moving the cocaine into Ecuador and then importing it into the United States.

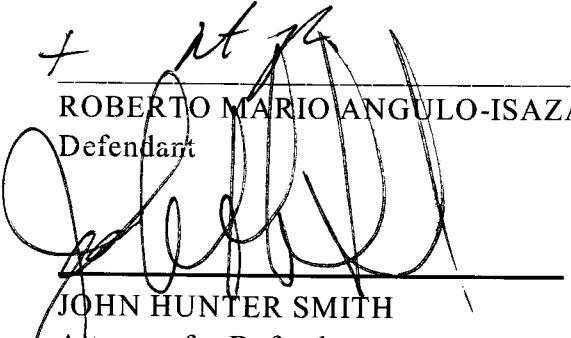
Poveda-Ortega's role was to supply the cocaine. Rengifo-Pareja's role was to arrange for the transportation of the cocaine. Angulo-Isaza's role was to work with Poveda-Ortega to ensure that the cocaine was acquired, and with Rengifo-Pareja to ensure that the cocaine was successfully transported from Ecuador to Spain.

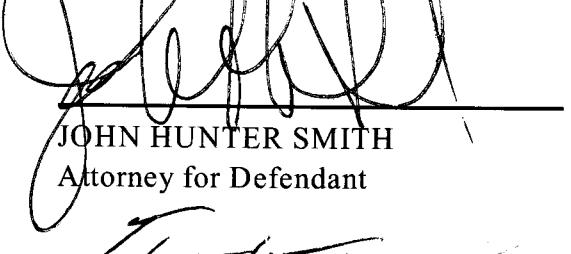
On October 6, 2007, in furtherance of the conspiracy, 320 kilograms of cocaine arrived in Quito, Ecuador.

On October 16, 2007, in furtherance of the conspiracy, the 320 kilograms of cocaine were flown from Ecuador to Dallas under law enforcement control.

On October 24, 2007, in furtherance of the conspiracy, the 320 kilograms of cocaine were flown under law enforcement control from Dallas to Madrid, Spain. The cocaine was then turned over to the authorities in Spain.

AGREED TO AND SIGNED this 30 day of April, 2013.

  
ROBERTO MARIO ANGULO-ISAZA  
Defendant

  
JOHN HUNTER SMITH  
Attorney for Defendant

  
THOMAS WYNNE  
Attorney for Defendant

  
MARK IRISH  
U.S. Department of Justice  
Asset Forfeiture and Money Laundering Section  
1400 New York Avenue, N.W. Ste. 10100  
Washington, D.C. 20350  
Dist. of Puerto Rico 209107  
(202) 514-1263 (telephone)  
(202) 514-5522 (facsimile)  
mark.irish2@usdoj.gov